

HARRIS

ST. LAURENT

WECHSLER

June 19, 2023

By ECF

Hon. Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Ishan Wahi, 22-cr-392 (S.D.N.Y.)

Your Honor:

I am one of the lawyers representing defendant Ishan Wahi in this case. On May 9, 2023, the Court sentenced Ishan Wahi to 24 months of incarceration and directed him to surrender to a facility to be identified by the Bureau of Prisons before 2 p.m. on Wednesday, June 21, 2023. (Docket Entry 98). Following a request from Ishan Wahi, the Court extended Ishan Wahi's surrender date to June 26, 2023. (Docket Entry 103).

I am writing to respectfully request that the Court extend Ishan Wahi's surrender date for three weeks, from Monday, June 26, 2023 to Monday, July 17th.

This reason for this request is the following. On Friday, June 16th, Ishan Wahi received his designation from the Bureau of Prisons. He has been designated to AUSP Thomson, a facility in Thomson, Illinois. This is not the facility that the Court recommended he be designated to (which was Fort Dix FCI), nor is it one of the qualifying facilities within 500 miles of Ishan Wahi's current residence in Houston, Texas, FCI Beaumont or FCI Bastrop, both of which are within reasonable driving distance of Ishan Wahi's girlfriend in Houston and his uncle in Austin. AUSP Thomson is not close to any of Ishan Wahi's family and will be difficult for his family, most of which is overseas, to visit.

To be clear, Ishan Wahi seeks an extension solely to request a change in the designation from the Bureau of Prisons. Ishan is not seeking any relief from the Court regarding the designation but only for a short extension so that he can make an administrative application to the Bureau of Prisons.

The government (AUSA Nicolas Roos) consents to this application

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Thank you for considering this request.

Respectfully,



Andrew St. Laurent

cc: AUSA Noah Solowiejczyk (by ECF)
AUSA Nicolas Roos (by ECF)
David Miller, Esq. (by ECF)

SO ORDERED.



6/20/2023